

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

-against-

WALMART INC. AND WAL-MART STORES  
EAST, LP,

Defendants.

Case No. 20-1744-CFC-EGT

**STIPULATION AND [PROPOSED] ORDER AUTHORIZING DISCLOSURE OF  
FEDERAL BUREAU OF INVESTIGATION RECORDS**

The Federal Bureau of Investigation (“FBI”) and Defendants Walmart Inc. and Wal-Mart Stores East, LP, (together, “Walmart”) pursuant to the Protective Order (D.I. 88) in the above-captioned action (this “Litigation”), respectfully submit this Stipulation and Proposed Order Authorizing Disclosure of FBI Records.

WHEREAS, the FBI maintains a system of records relating to its investigations.

WHEREAS, Walmart served a subpoena on the FBI on October 29, 2024, requesting records pertaining to certain identified individuals maintained on the FBI’s system of records.

WHEREAS, the FBI believes that the Privacy Act of 1974, 5 U.S.C. § 552a (the “Privacy Act”) requires an Order from this Court to permit the disclosure of agency records without prior written consent of the individuals to whom the records pertain, absent an applicable exception.

WHEREAS, the FBI and Walmart recognize that the requested agency records may require specific handling and designation under the Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, subject to the approval of this Court and pursuant to the Court’s authority under Fed. R. Civ. P. 26(c), that:

Pursuant to 5 U.S.C. § 552a(b)(12) of the Privacy Act, the FBI, its officers, agents, employees, and representatives are authorized to release to defendant’s counsel, or other

representatives and to the Court in this Litigation, any records or information protected by the Privacy Act, the disclosure of which, absent an Order from this Court, could potentially constitute a violation of law. Such disclosures will be subject to the Protective Order (D.I. 88) entered on November 18, 2022.

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/s/ Roger J. Gural

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*Attorneys for Defendants Walmart Inc. and  
Wal-Mart Stores East, LP*

Dated: May 9, 2025

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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Honorable Eleanor G. Tennyson  
United States Magistrate Judge